

Supplemental Response Regarding Sanctions

Applicant is among a group of attorneys who were sanctioned by the U.S. District Court for the Eastern District of Michigan in the case *King v. Whitmer*, No. 20-cv-13134 (E.D. Mich.) (see ECF Nos. 172 and 179). The sanctions consist of a monetary assessment for attorney fees and a CLE requirement. Applicant believes that the sanctions as to him are legally barred as he did not enter an appearance, communicate with clients, or have any control over decisions made in connection with the litigation. In fact, Applicant is not mentioned substantively in the Court's Orders.

In the *King* case, Applicant assisted with legal research and editing the complaint and motion for temporary restraining order for grammar, punctuation, and formatting. Applicant did not have any decision-making authority, did not participate in strategic decisions and did not control what edits were accepted for the final work product. Applicant also assisted in the preparation of an amended complaint by formatting, conducting research (as assigned), reorganizing sections, and proofreading work product.

The Court's opinion is currently on appeal to the U.S. Court of Appeals for the Sixth Circuit. Applicant believes that the sanctions entered against him, jointly and severally with all other attorneys for the plaintiff in the action, will be reversed.

Neither the motion for sanctions nor the Court order alleged or identified any specific misconduct by Applicant and were based on the presence of Applicant's name on pleading in these cases along with those of several other attorneys.

Apart from these sanctions, no complaint, allegation of professional misconduct, or motion for sanctions has been filed against Applicant in over 20 years of legal practice.

Applicant will provide any information that the Court deems appropriate in the consideration of this application.